

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CATHERINE ALEXANDER,)
)
Plaintiff,)
) Case No: 3:18-cv-0966-SMY-MAB
v.)
) JURY TRIAL DEMANDED
TAKE-TWO INTERACTIVE SOFTWARE, INC.,)
et al.,)
)
Defendants.)

PLAINTIFF CATHERINE ALEXANDER'S MOTION TO FILE EXHIBIT UNDER SEAL

Plaintiff Catherine Alexander ("Plaintiff"), by and through her counsel and for her Motion to File Exhibit Under Seal states:

1. On January 22, 2019, the Court issued a Stipulated Protective Order at Dkt. No. 111.
2. Pursuant to Section 9(a) of that Protective Order, "Any Party seeking to file any material under seal shall obtain leave from the Court to do so. The Party requesting leave shall submit the materials sought to be filed under seal to Chambers via e-mail. If the Court grants the Party leave to file under seal, the Party shall file unredacted papers under seal through ECF in conformity with the procedures set forth by the Clerk of Court."
3. Exhibit G to Plaintiff's Memorandum In Support of her Motion for Summary Judgement (Dkt. No. 140-7) contains confidential information as designated by the Parties and as defined in the Protective Order.
4. Plaintiff respectfully requests leave to file Exhibit G, an excerpt from the deposition of Mark Little, one of Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment' 30(b)(6) witnesses, under seal.

WHEREFORE, Plaintiff respectfully requests that the Court grant leave for Plaintiff to file Exhibit G to its Memorandum in Support of its Partial Motion for Summary Judgment (Dkt. No. 140-7) under seal.

Dated: November 12, 2019

Respectfully submitted,

/s/ Anthony R. Friedman

Anthony G. Simon, IL 6209056
Benjamin R. Askew, IL 6291366
Anthony R. Friedman, IL 6299795
THE SIMON LAW FIRM, P.C.
800 Market Street, Suite 1700
St. Louis, Missouri 63101
Phone: (314) 241-2929
Fax: (314) 241-2029
asimon@simonlawpc.com
basekew@simonlawpc.com
afriedman@simonlawpc.com

R. Seth Crompton
THE HOLLAND LAW FIRM
300 N. Tucker, Suite 801
St. Louis, Missouri 63101
scrompton@allfela.com
Phone: (314) 241-8111
Facsimile: (314) 241-5554

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record this 12th day of November, 2019 via the Court's CM/ECF system.

/s/ Anthony R. Friedman